

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

United States of America

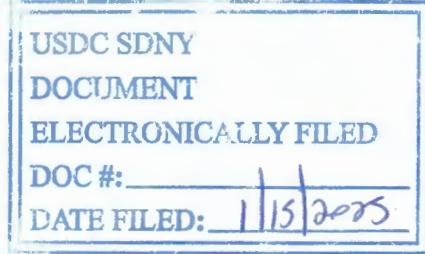
v.

RAFAT AMIROV,  
a/k/a "Farkhaddin Mirzoev,"  
a/k/a "Рим,"  
a/k/a "Rome,"  
POLAD OMAROV,  
a/k/a "Araz Aliyev,"  
a/k/a "Novruz Novruzzade,"  
a/k/a "Polad Qaqa,"  
a/k/a "Haci Qaqa,"

*Defendants.*

[Proposed] 3500 Protective Order

S8 22 Cr. 438 (CM)



Upon the application of the United States of America, Edward Kim, Acting United States Attorney for the Southern District of New York, by and through Jacob Gutwillig, Matthew Hellman, and Michael Lockard, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500, *Giglio v. United States*, 405 U.S. 150 (1972), and the Government's general disclosure obligations ("3500 Material"), in connection with the trial that is scheduled to begin March 10, 2025 in this matter (the "Trial"), and providing additional protections to a designated subset of the 3500 Material which has been classified "Attorney's Eyes Only" (the "Attorney's Eyes Only 3500 Material");

Whereas, (i) certain of the 3500 Material will contain sensitive information that impacts the safety of witnesses and members of their families; and (ii) Rafat Amirov and Polad Omarov, by and through counsel, consent to the entry of this Order, the Court finds that there is good cause for the requested relief, IT IS HEREBY ORDERED that:

(1) the defendants and their defense teams shall not show or disseminate any of the 3500 Material to anyone other than the defendants, defense counsel, and any U.S.-based paralegals, staff, and interpreters employed by the defense;

(2) the defendants and their defense team, including any U.S.-based paralegals, staff, and interpreters employed by the defense, shall not transmit any of the 3500 Material outside the United States;

(3) the defendants shall not possess any of the 3500 Material, either before, during, or after the Trial, except when reviewing the 3500 Material in the presence of counsel, or any paralegal, staff, and interpreters employed by the defense;

(4) any 3500 Material having been clearly designated as “Attorney’s Eyes Only 3500 Material,” including any copies thereof or excerpts therefrom, or any information contained therein, shall not be disclosed to or possessed by the defendants, and may be disclosed only to defense counsel and to any paralegal or staff employed by the defense, until February 28, 2025, two weeks before the scheduled start of the Trial or at earlier date by designation of the Government, whereupon the Attorney’s Eyes Only 3500 Material shall be afforded the same protections as 3500 Material;

(5) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the trial of this matter or when any appeal has become final; and

(6) defense counsel may seek authorization of the Court, with notice to the Government, to provide certain specified materials to persons whose access to such materials is otherwise prohibited by this Order, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case.

SO ORDERED:

Dated: New York, New York  
January 15, 2025



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HONORABLE COLLEEN MCMAHON  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK